

**### Title:**

**\*\*Spouses Edmond Lee and Helen Huang vs. Land Bank of the Philippines\*\***

**### Facts:**

1. **\*\*Property Acquisition\*\***: Edmond Lee and Helen Huang owned 5.4928 hectares of land in Mambog, Hermosa, Bataan, covered by Transfer Certificate of Title No. T-26257.
2. **\*\*Compulsory Acquisition\*\***: The property was compulsorily acquired by the Department of Agrarian Reform (DAR) under RA 6657, also known as the Comprehensive Agrarian Reform Law of 1988.
3. **\*\*Valuation Dispute\*\***: DAR valued a portion of the land (1.5073 hectares) at P109,429.98. The petitioners rejected the valuation and filed a petition for determination of just compensation against the Provincial Adjudicator Erasmo SP. Cruz of DARAB and the Land Bank of the Philippines (LBP) before the RTC.
4. **\*\*RTC Decision (2002)\*\***: The RTC set the just compensation at P250 per square meter, totaling P3,768,250. LBP's motion for reconsideration was denied.
5. **\*\*Notice of Appeal\*\***: LBP filed a Notice of Appeal; however, petitioners later claimed no actual appeal was filed.
6. **\*\*Motion for Execution (2006)\*\***: Petitioners sought execution of the RTC's 2002 Decision, arguing that LBP had not prosecuted its appeal. The RTC found that LBP had perfected its appeal, with a postal money order issued for the appeal fee, and thus transmitted records to the CA.
7. **\*\*Final RTC Orders (2007-2008)\*\***: The RTC denied the petitioners' motion for reconsideration, confirming LBP's appeal was perfected.
8. **\*\*Motion to Dismiss Appeal (2013)\*\***: Petitioners filed to dismiss LBP's appeal due to failure to prosecute. The RTC dismissed the appeal, finding no proof of payment of the appellate docket fees.
9. **\*\*CA Decision (2015)\*\***: The CA reversed the RTC's dismissal, stating that the validity of the appeal was already established and the RTC lost jurisdiction upon perfection of appeal.

**### Issues:**

1. Whether the RTC had jurisdiction to dismiss LBP's appeal for failure to prosecute.
2. Whether LBP perfected its appeal by fulfilling the requirement of paying appellate docket fees.

**### Court's Decision:**

**\*\*Issue 1\*\***: **\*\*Jurisdiction to Dismiss Appeal\*\***

- The Supreme Court held that the RTC retained jurisdiction to dismiss the appeal because

LBP failed to perfect its appeal due to non-payment of docket fees, essential for jurisdiction.

**\*\*Issue 2\*\*:** **\*\*Perfection of Appeal\*\***

- The Supreme Court confirmed that LBP did not provide proof of payment of appellate docket fees. Hence, LBP's appeal was not perfected, and the RTC's initial 2002 decision became final and executory.

**### Doctrine:**

- **\*\*Payment of Docket Fees\*\*:** The payment of appellate docket fees within the prescribed period is both mandatory and jurisdictional. Failure to comply results in non-perfection of the appeal, and the original court retains jurisdiction.
- **\*\*Appeal as a Statutory Right\*\*:** The right to appeal is statutory; strict compliance with statutory requirements, including payment of fees, is essential for perfection of the appeal.

**### Class Notes:**

- **\*\*Key Concepts\*\*:**
- **Perfecting an Appeal:** Requires timely filing of notice and payment of appellate docket fees.
- **Jurisdiction:** Failure to perfect appeal keeps jurisdiction with the lower court.
- **\*\*Relevant Statutes\*\*:**
- **Section 4, Rule 41 of the Rules of Court:** Payment of appellate court docket and lawful fees.
- **Section 9, Rule 41 of the Rules of Court:** Effects of the perfection of appeal on jurisdiction.
- **\*\*Application\*\*:** This case underscores the necessity of fulfilling all procedural requirements for an appeal. It clarifies the jurisdictional consequences of non-compliance.

**### Historical Background:**

- **\*\*Context\*\*:** The case arises under the Comprehensive Agrarian Reform Law of 1988 (RA 6657), a pivotal measure in Philippine agrarian reform, mandating land redistribution and ensuring fair compensation. The decision highlights legal intricacies in determining just compensation for compulsorily acquired land and the critical procedural aspects in appellate litigation.